

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
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This document relates to:

Burnett, et al. v. Islamic Republic of Iran, No. 15-cv-9903 (GBD)(SN)

DECLARATION OF ELBA IRIS CEDENO

I, ELBA IRIS CEDENO, hereby declare under penalty of perjury:

1. I am currently 63 years of age and reside in Jupiter, Florida.
2. I was the domestic partner of Catherine ("Cathy") Smith who was killed in the September 11, 2001 Terrorist Attacks at the World Trade Center in New York where she was an Assistant Vice President at Marsh & McLennan.
3. At the time of her death on September 11, 2001, Catherine ("Cathy") Smith and I had resided together as a couple for seven years though we had known each other for nearly 20 years.
4. We were together as life partners as the role of spouse in each other's life until such time as marriage would have been legal and permitted in New Jersey.
5. We were building our retirement home at 134 Mermaid Drive, Manahawkin, New Jersey, but we lived together at 178 East Railroad Avenue, West Haverstraw, New York.
6. We lived for each other every day. We cooked together, danced together, vacationed together, woke up every morning together, and lived in every other way like a married couple.

7. We loved each other and had plans for the future. We had plans to travel to Europe for my 50th birthday and for Catherine to take an early retirement so we could spend our days near the beach in New Jersey.

8. In Catherine's will, she named me as her Executrix, and when the will was put into probate, I served that role for her estate.

9. To the extent that I survived her, Catherine's will devised her entire estate to me. If I had passed before her, Catherine had provided that 25% of the proceeds of the sale of our home would be devised to my daughter Duska Cedeno.

10. Catherine named me as a beneficiary of both her life insurance and her workers' compensation plans as her domestic partner.

11. We shared bank accounts together and were completely committed to one another.

12. The only thing we did not share was marriage, but we fully intended to get married if New Jersey law would ever allow us to do so.

13. I referred to Catherine as my wife, and she referred to me as her wife.

14. The September 11, 2001 Terrorist Attacks destroyed the life that Catherine and I built together, and I will never be the same after losing her.

15. She was my spouse in all ways except name.

I declare under penalty of perjury that the foregoing is true and correct.

Date:

Aug. 2, 2018

Elba Iris Cedeno
Elba Iris Cedeno